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UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

CHRIS SMITH, CHERYL SMITH, KAREN SMITHSON, ALBERTO CORNEA, MICHELLE ROGERS, DEBORAH CLASS, AMBER JONES, ALEXIS KEISER, LOORN SALEE, THOMAS PEAR, and TANNAISHA SMALLWOOD, individually and on behalf of all other similarly situated individuals,

No. 4:21-cv-09527-HSG

**JOINT STATUS UPDATE AND  
STIPULATED REQUEST AND  
ORDER TO EXTEND STAY**

## CLASS ACTION

Dept.: Courtroom 2  
Judge: Hon. Haywood S. Gilliam, Jr.

#### **Plaintiffs**

V.

APPLE INC.,

## Defendant

Pursuant to the Court's February 20, 2024 Order and Civil Local Rule 6-2, the parties submit this joint status update and stipulated request to extend the stay of this action for an additional thirty days. On November 3, 2023, the parties notified the Court that they had reached an agreement in principle to resolve the case. (ECF No. 137.) The Court granted the parties' joint request to stay the action for thirty days to provide the parties time to finalize their agreement. (ECF No. 138.) The parties filed further joint status updates on December 4, 2023, January 18, 2024, and February 19, 2024, requesting that the stay of this action be extended while the parties continued to meet and confer about the terms of the resolution of this action, which the Court granted. (ECF Nos. 140, 141, 143, 144, 146, 147.)

The parties have made significant progress regarding terms to resolve this action and have exchanged drafts of a settlement agreement, but require additional time to finalize the agreement and related documents. The parties therefore respectfully request that the stay of this action be extended for an additional thirty days. The parties will file an additional joint status update by April 19, 2024, to apprise the Court of the status of their agreement.

Dated: March 20, 2024

CUNNINGHAM BOUNDS, LLC

By: /s/ Steven L. Nicholas  
STEVEN L. NICHOLAS

Attorneys for Plaintiffs,  
CHRIS SMITH, CHERYL SMITH, KAREN  
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DEBORAH CLASS, AMBER JONES,  
ALEXIS KEISER, LOORN SAELEE,  
THOMAS PEAR, and TANNAISHA  
SMALLWORD, individually and on behalf of  
all other similarly situated individuals,

1 Dated: March 20, 2024

MORRISON & FOERSTER LLP

2 By: /s/ Erin M. Bosman  
ERIN M. BOSMAN

3 Attorneys for Defendant  
4 APPLE INC.

5

6 **ECF ATTESTATION**

7 I, Erin Bosman, am the ECF User whose ID and password are being used to file this  
8 document. In compliance with Civil Local Rule 5-1(i)(3), I attest that Steven L. Nicholas has  
9 concurred to this filing.

10 Dated: March 20, 2024

MORRISON & FOERSTER LLP

12 /s/ Erin M. Bosman  
13 ERIN M. BOSMAN

14 Attorneys for Defendant  
15 APPLE INC.

16

17 **ORDER**

18 Pursuant to stipulation, the stay of the above-captioned action is hereby extended for an  
19 additional thirty days. The parties shall file a joint status update by April 19, 2024.  
20

21 IT IS SO ORDERED.

23  
24 Dated: 3/21/2024

  
25 Hon. Haywood S. Gilliam, Jr.  
United States District Judge